

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

GERALD ACKERMAN, ET AL

Plaintiff,

NO. 4:13-cv-14137

v

HON. LINDA V. PARKER

HEIDI WASHINGTON,

MAG. MONA K. MAJZOUN

Defendant.

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**STIPULATED PROTECTIVE ORDER**

All parties hereby stipulate and agree that the video footage referenced in this stipulation is subject to the restrictions in this Stipulation and Protective Order. The Plaintiffs' counsel may obtain the following: Video footage of the kitchen area of the Macomb Correctional Facility from July 7, 2018 (between 12:00 p.m. and 4:00 p.m.), and July 14, 2018 (between 12:00 p.m. and 4:00 p.m.), recording activities within the area where religious meals are prepared for all three meals each day.

The video footage listed above shall be subject to this Protective Order, due to security and safety concerns of the Michigan Department of Corrections (MDOC) surrounding the security of a state prison, and prison staff. The MDOC asserts that release of the video footage outside of the strictures of this protective order could compromise the ability of the MDOC to maintain order and security in its facility. The MDOC and the Attorney General's Office are not bound by the terms of this Order

The video footage listed above may be used only by the Plaintiffs' counsel for the purposes of this proceeding. The video footage is not to be released to the public or any prisoner, except it may be shown to the Plaintiffs, Gerald Ackerman and Mark Shaykin. The video footage listed above, with the exception of showing it to the Plaintiff, shall not

be shown to, provided to, or kept by any prisoner, former prisoner, or any other person not employed by the MDOC, and shall not be published in any form, absent further Order of this Court.

The video footage referenced above may not be filed with the Court or the Court Clerk's Office, unless it is filed under seal per Fed. R. Civ. P. 5.2 and applicable local rules.

**IT IS SO ORDERED.**

s/ Linda V. Parker  
LINDA V. PARKER  
U.S. DISTRICT JUDGE

Dated: August 6, 2018

**IT IS SO STIPULATED.**

Date: August 6, 2018

Daniel E. Manville w/permission  
Daniel E. Manville  
*Counsel for Plaintiffs*

Date: August 6, 2018

/s/ John L. Thurber  
John L. Thurber  
*Counsel for Defendant*